Company Tracking Number: BCA10R

TOI: A021 Individual Annuities- Deferred Non- Sub-TOI: A021.003 Single Premium

Variable

Product Name: BCA10

Project Name/Number: /

Filing at a Glance

Company: American National Insurance Company

Product Name: BCA10 SERFF Tr Num: AMNA-126826809 State: Arkansas

TOI: A02I Individual Annuities- Deferred Non- SERFF Status: Closed-Accepted State Tr Num: 47015

Variable For Informational Purposes

Sub-TOI: A02I.003 Single Premium Co Tr Num: BCA10R State Status: Filed-Closed

Filing Type: Form Reviewer(s): Linda Bird

Author: Tyra Reed Disposition Date: 10/12/2010

Date Submitted: 10/08/2010 Disposition Status: Accepted For

Informational Purposes
Implementation Date:

Implementation Date Requested: 11/01/2010

State Filing Description:

General Information

Project Name: Status of Filing in Domicile: Pending

Project Number:

Requested Filing Mode: Informational

Explanation for Combination/Other:

Submission Type: New Submission

Overall Rate Impact:

Date Approved in Domicile:

Market Type: Individual

Group Market Size:

Group Market Type:

Filing Status Changed: 10/12/2010 Explanation for Other Group Market Type:

State Status Changed: 10/12/2010

Deemer Date: Created By: Tyra Reed

Submitted By: Tyra Reed Corresponding Filing Tracking Number: AMNA-

126552199 / 45443

Filing Description:

RE: American National Insurance Company (NAIC: 60739 FEIN: 74-0484030)

Informational Submission of Revised Memorandum of Variable Material

SERFF Tracking Number: AMNA-126826809

Company Tracking Number: BCA10R

Please find attached a revised Memorandum of Variable Material for the following previously approved forms:

Company Tracking Number: BCA10R

TOI: A021 Individual Annuities- Deferred Non- Sub-TOI: A021.003 Single Premium

Variable

Product Name: BCA10

Project Name/Number:

Form Number Approval Date SERFF / State Tracking Number

Form BCA10-6-DP 4/19/2010 AMNA-126552199 / 45443

Form BCA10-10-DP Form BCA10-12-DP Form MDBRE10-DP

Form BCA10-6-DP, Form BCA10-10-DP and Form BCA10-12-DP are specifications pages used with previously approved, individual single premium equity-indexed deferred annuity contract forms, Form BCA10NQ and Form BCA10PQ (both of which were filed and approved under the same SERFF / State tracking numbers shown above).

Form MDBRE10-DP is a specifications page used with a previously approved Guaranteed Minimum Death Benefit with Premium Enhancement Rider, Form MDBRE10. The rider is issued in conjunction with the above referenced annuity contracts and was also filed and approved under the same SERFF / State tracking number as shown above.

To date, we have not accepted any applications for or issued any contracts/riders on the above mentioned forms, although we are planning to launch the products soon. Due to the economic conditions, as they have evolved in the last few months, and notably the even lower investment interest rates available today, and the higher cost of options to hedge the product, we are submitting revised Memorandum of Variable Material to adjust the following:

(BCA10-6-DP, BCA10-10-DP, BCA10-12-DP)

- Minimum Guaranteed Value Interest Rate adjustment of minimum range from 1.5 % to 1.0 %
- Guaranteed Minimum Surrender-Charge-Free-Withdrawal Percentage updated to clarify that the percentage may vary by rider selection
- Initial Declared Rate adjustment of minimum range from 1.0 % to 0.5 %.
- Initial Strategy Fee adjustment of maximum range from 3.0 % to 5.0 %.
- Strategy Fee adjustment of maximum range from 3.0 % to 5.0 %.
- Declared Rate adjustment of minimum range from 1.0 % to 0.5 %

(MDBRE10-DP)

- Rider Fee adjustment of current rider fee to be based on the base contract and issue age of the contract owner.
- Premium Enhancement Percentage adjustment of the current enhancement percentage to be based on the base contract and issue age of the contract owner.
- Recapture Charge Rate adjustment of charge to be based on surrender change period of base product, and issue age of the contract owner.

Company Tracking Number: BCA10R

TOI: A021 Individual Annuities- Deferred Non- Sub-TOI: A021.003 Single Premium

Variable

Product Name: BCA10

Project Name/Number:

Please note that on contracts where the owner is not a natural person (as defined within the contract), the age used will be that of the oldest annuitant.

We will utilize the ranges and structures within the originally submitted and approved Memorandum of Variable Material until October 31, 2010, and will begin utilization of the revised ranges effective November 1, 2010.

If your department requires that these updates to the ranges be submitted for prior approval as opposed to informational, please advise.

Additional information regarding the updates is provided / attached below:

- Payment for the required filing fee in the amount of \$100 was submitted via EFT with this filing;
- Updated Nonforfeiture Demonstration/Actuarial Memorandum with a calculations attachment
- Updated Memorandum of Variability for each specifications page
- Any required for a third party authorization has been bypassed, as this is not a third-party filing

We thank you in advance for your review of the submission. Should you have any questions or require any additional information or documentation, please let us know.

Company and Contact

Filing Contact Information

Tyra Reed, Policy Analyst tyra.reed@anico.com

One Moody Plaza 409-763-1112 [Phone] 5222 [Ext]

Product Development--14th Floor 409-766-6933 [FAX]

Galveston, TX 77550

Filing Company Information

American National Insurance Company CoCode: 60739 State of Domicile: Texas

One Moody Plaza Group Code: 408 Company Type:
Galveston, TX 77550 Group Name: State ID Number:

(409) 763-4661 ext. [Phone] FEIN Number: 74-0484030

Filing Fees

Fee Required? Yes Fee Amount: \$100.00 SERFF Tracking Number: AMNA-126826809 State: Arkansas

Filing Company: American National Insurance Company State Tracking Number: 47015

Company Tracking Number: BCA10R

TOI: A02I Individual Annuities- Deferred Non- Sub-TOI: A02I.003 Single Premium

Variable

Product Name: BCA10

Project Name/Number:

Retaliatory? Yes

Fee Explanation:

Per Company: No

COMPANY AMOUNT DATE PROCESSED TRANSACTION #
American National Insurance Company \$100.00 10/08/2010 40458317

 SERFF Tracking Number:
 AMNA-126826809
 State:
 Arkansas

 Filing Company:
 American National Insurance Company
 State Tracking Number:
 47015

Company Tracking Number: BCA10R

TOI: A02I Individual Annuities- Deferred Non- Sub-TOI: A02I.003 Single Premium

Variable

Product Name: BCA10

Project Name/Number: /

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Accepted For Linda Bird		10/12/2010	10/12/2010
Information	al		
Purposes			

Company Tracking Number: BCA10R

TOI: A021 Individual Annuities- Deferred Non- Sub-TOI: A021.003 Single Premium

Variable

Product Name: BCA10

Project Name/Number: /

Disposition

Disposition Date: 10/12/2010

Implementation Date:

Status: Accepted For Informational Purposes

Comment:

Rate data does NOT apply to filing.

Company Tracking Number: BCA10R

TOI: A02I Individual Annuities- Deferred Non-Sub-TOI: A02I.003 Single Premium

Variable

Product Name: BCA10

Project Name/Number:

Schedule Schedule Item Schedule Item Status Public Access Flesch Certification **Supporting Document** No **Supporting Document** Application No **Supporting Document** Life & Annuity - Acturial Memo No **Supporting Document** Memorandum of Variable Material

No